

REMARKS / ARGUMENTS

In the present application, claims 1-44 are currently pending. Claims 1-11, 14-20, 23-31 and 34-42 have been rejected under 35 U.S.C. § 102(b) as anticipated by British patent number GB 2311697 A to Sugiura et al. (“Sugiura”).

Applicants have amended claims 1-5, 9-14, 18-27, 31-36, and 40-44, and have canceled claims 6-8, 15-17, 28-30, and 37-39. Independent claims 1 and 23 have been amended to specifically recite the use of a table of “mathematically estimated wireless signal strengths and corresponding mobile unit locations”. Dependent claims 2-5, 9-14, 18-22, 24-27, 31-36, and 40-44 have been amended to provide proper antecedent basis and otherwise conform to amended independent claims 1 and 23. Applicants have also added new claims 45-56, which are analogous to amended method claims 1-5, 11-14, and 20-22, respectively, and amended apparatus claims 23-27, 33-36, and 42-44, respectively.

The Sugiura reference cited by the Office action does not teach or suggest the claimed “table of mathematically estimated wireless signal strengths and corresponding mobile unit locations”. In fact, Sugiura does not disclose *any* mathematical estimations of signal strength. Nor does Sugiura describe any formulas or other mechanisms by which a wireless signal strength could be mathematically estimated. Instead, all that is disclosed is the use of a table containing empirically measured wireless signal strengths and the locations at which those measurements were performed. Sugiura specifically states that:

The operation of the radiocommunication system according to this embodiment is divided into a preparation for inputting the positional information of a plurality of measuring points within a service area and the radio strength data comprising reception radio strength levels from a plurality of base stations into the radio strength data storage section 1202 in advance and a detection process for estimating the position of a mobile station on the basis of the stored radio strength data. As the way

to input the data in the preparation, methods are available to *communicate and input the reception radio strength levels from a plurality of base stations measured by a mobile station*, together with the positional information, in real time or to together input the reception radio strength data from base stations measured in an online way through a wire connection. However, in this instance, the radio strength data is already inputted into radio strength data storage section, and the description of the inputting way is omitted for brevity.

Sugiura, p. 73, lines 9-25 (emphasis added).

As can be seen, the only type of table disclosed by Sugiura is created by “input[ing] the reception radio strength levels from a plurality of base stations *measured* by a mobile station”. *Id.*, p. 73, lines 18-19 (emphasis added). No additional methods for generating a table of signal strengths and corresponding locations are disclosed. In fact, as quoted above, Sugiura specifically states that the table “is *already inputted* into radio strength data storage section, *and the description of the inputting way is omitted for brevity.*” *Id.*, p. 73, lines 23-25 (emphasis added).

Because the only table taught or suggested by Sugiura is a table of empirically measured wireless signal strengths and the locations at which those measurements were performed, and not the claimed “table of mathematically estimated wireless signal strengths and corresponding mobile unit locations”; and because each of the independent claims recites the “table of mathematically estimated wireless signal strengths and corresponding mobile unit locations”, it is respectfully submitted that all of the pending claims of the present application are allowable over the prior art of record.

CONCLUSION

The application is considered to be in good and proper form for allowance, and the examiner is respectfully requested to pass this application to issue. If, however, the examiner believes that the claimed table of “mathematically estimated wireless signal strengths and corresponding mobile

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unit locations" is, in fact, taught or suggested by Sugiura, it is respectfully requested that the examiner provide a pinpoint citation to the line or lines specifically disclosing such a table to better enable the applicants to address the examiner's concerns.

If, in the opinion of the examiner, a telephone conference would expedite the prosecution of the subject application, the examiner is invited to call the undersigned attorney.

Respectfully submitted,



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